

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**HARRISON COMPANY LLC,**

**Plaintiff,**

**v.**

**A-Z WHOLESALERS INC. and  
BARKAT G. ALI,**

**Defendants.**

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**CIVIL ACTION NO. 3:19-CV-1057-B**

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**PLAINTIFF’S MOTION TO CLARIFY AND RECONSIDER**

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Plaintiff Harrison Company, LLC (“Harrison”) moves for clarification and reconsideration of the Court’s Order on the Parties’ Cross-Motions for Summary Judgment pursuant to Federal Rule of Civil Procedure 54(b). Pursuant to Local Rules 7.1 and 7.2, Harrison’s arguments and authorities in support of this Motion are set forth in Plaintiff’s Brief in Support of its Motion to Clarify and Reconsider, which is being filed simultaneously with this Motion.

Respectfully submitted,

/s/ Joseph A. Unis, Jr.

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(b), I certify that on November 3, 2020, I conferred telephonically with counsel for Defendants, Guy Holman, regarding the relief requested in this motion. To the extent Harrison seeks clarification regarding (i) the claims and defenses at issue for trial; (ii) the specific fact issues for the jury to resolve at trial; and/or (iii) the element of a claim or defense to which any fact issue relates, Defendants are not opposed to the relief requested in this motion; however, Defendants are opposed to this motion to the extent it requests the Court reconsider its Order and grant summary judgment for Plaintiff on Plaintiff's breach of contract claim and/or on any affirmative defense.

/s/ Joseph A. Unis, Jr.

Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that on November 4, 2020, I served this document on all counsel of record via the ECF system and/or email.

/s/ Joseph A. Unis, Jr.

Counsel for Plaintiff